AT&T

Robert W. Quinn, Jr.
Director - Federal Government Affairs

Suite 1000
1120 20th St., NW
Washington, DC 20036
202 457-3851
FAX 202 457-2545

May 12, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street SW, Room TWB-204
Washington, D.C. 20554

RE: Ex Parte
Second Application by BellSouth Telecommunications, Inc. and BellSouth Long Distance, Inc. for Provisioning of In-Region, interLATA Service in Louisiana., CC Docket No. 98-121

Application by Ameritech Michigan Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, interLATA Service in Michigan., CC Docket No. 97-137

Dear Ms. Roman Salas:

On Tuesday May 11, 1999, Harry Davidow, Ray Crafton, Rich Rubin, and I of AT&T met with Andrea Kearney, Bill Agee, Claudia Pabo, Jessica Rosenworcel, Eric Einhorn, and John Stanley of the Common Carrier Bureau. The purpose of this meeting was to discuss the draft results of the KPMG third party operational support systems in New York, as well as various issues related to Bell Atlantic's provisioning of "hot cut" loops. Attached is a copy of the outline utilized and distributed during yesterday's meeting.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules.

Sincerely,

Robert W. Quinn, Jr.

cc: A. Kearney
B. Agee
C. Pabo
E. Einhorn
J. Rosenworcel
J. Stanley

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KPMG'S THIRD PARTY TEST RESULTS OF BELL ATLANTIC-NEW YORK'S OSS

Presentation to the FCC Policy and
Program Planning Division Staff

May 11, 1999

The Interface Specification Process Is Unstable and Guarantees Delay in CLEC Service to Customers...

- Despite Change Control, Specifications Change Throughout the 66 Day Development Window

- Example: 1.5 Release in Production 2/20/99

Specifications Freeze 66 Days Before Production	12/15/98
Revised Bill Account Structure Published	01/25/99
100 Q&As Published	02/16/99
7 Critical Open Issues Published	02/19/99
Critical Open Issues Revised	03/04/99
Revised Bill Account Structure Published	03/08/99

- The 1.6 Release Will Not Fix The Documentation Deficiencies
  - –40% of the 168 Issues Remain Unresolved
  - –22 New Issues Have Been Created By the 1.6 Release Itself

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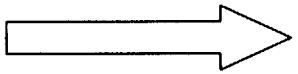
The Interface Specification Process Is Unstable and Guarantees Delay in CLEC Service to Customers (continued)

- Impacts
  - Customer Service Is Delayed
  - Development Re-Work Raises CLEC Costs
- Recommended Certification Activity: Change Control Process Operates Stably for
  - Upcoming Point Releases
  - EDI 10/LSOG4 Upgrade

The Certification and Testing Process Relies on an Inadequate Quality Assurance (QA) Environment That Guarantees Delay in CLEC Service To Customers

Current QA Environment

- Does Not Match Production Environment
- Has No Documentation
- Is Unstable



Interim QA Environment (May - October)

- QA Matches Production Some Days, Some Hours
- Technical Support Limited to 3 Hours/Day
- CLECs Book Test Time 30 Days Ahead
- First Come First Served

- How Can A CLEC Reserve Test Time When The Specifications Keep Changing?
- What Prevents The First CLEC From Blocking Other Access?
- Who Resolves Reservation Conflicts? BA? PSC? FCC? Lottery?
- Impact
  - Customer Service Delayed
  - Development Re-Work Raises CLEC Development Cost
  - Faulty Software Reaches Production
- Recommended Certification Activity: BA Opens Robust Test Environment 10/99
  - Test Environment Processes and Systems Operate As Promised for At Least 3 Months
  - The EDI10/LSOG4 Upgrade Is The Litmus Test

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Pre Ordering: BA's Inability To Deliver Fielded Access To The Customer Service Record (CSR) Throttles CLEC Marketing

- AT&T Access To Fielded CSR Will Not Be Market-Ready Until 10/1
- This Schedule Is In Serious Jeopardy
  - BA's Fielded CSR via EDI To Be Released 5/23 And Is Unproven
  - BA's Refusal to Accelerate Schedule Indicates Serious Jeopardy to 10/1
- Impact
  - –UNE-P New Installs Require Exact Re-Typing of Address To Avoid Rejection
  - Directory Listing Cannot Be Migrated As Is; Re-entry Errors Likely
  - Unable to Convert BA USOCs Into Plain Text for Customer Care Associate (CCA)
  - CCA Must Rely On Customer's Understanding of Present Features and Listing
  - Customer Satisfaction: Long, Tedious Ordering Process Fraught with Error
  - Cost: More CCAs Required
  - Volume Must Be Gated Until Capability Is Market-Ready
- Recommended Certification Activity
  - Fielded CSR Developed,Tested in Commercial Operation for 30 Days without Major Defects

Ordering & Provisioning: BA Has Refused To Provide A Key Operational Capability

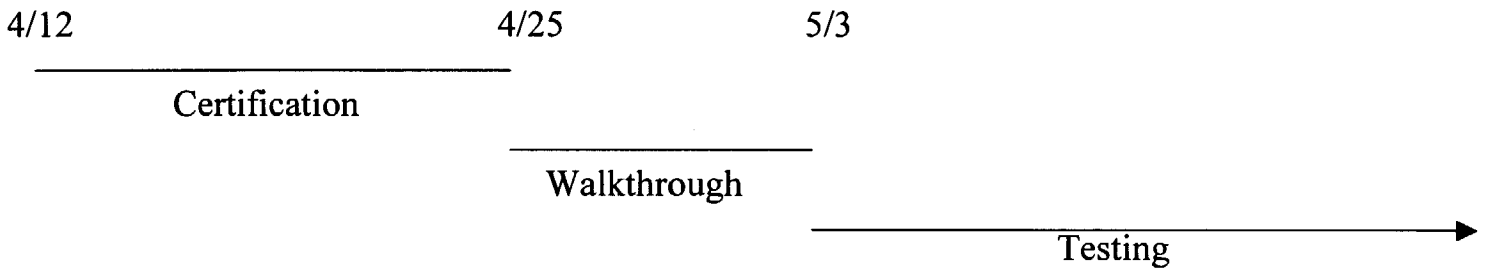
- BA Made Collaborative Commitment 5/98 to Produce Complex Completions by 11/98.
- BA Brought Forward A Phased Introduction Plan 12/98 and A Prototype 2/99.
- BA Reneged on Commitment to Provide This Capability 3/99.
- No Commitment To Provide at Present
- Snowball Effect On Operations As Volumes Rise
  - Increases CLEC Cost
  - Increases Customer Dissatisfaction
- Customer Satisfaction Is Damaged
  - No Proactive Detection of Provisioning Errors
  - Inaccurate Retail Bill
- Recommended Certification Activity: Complex Completion Developed, Tested, In Commercial Operation without Major Defects for 30 Days

Billing: CLECs Will Experience Major Loss of Revenue Until BA Corrects Deficiencies

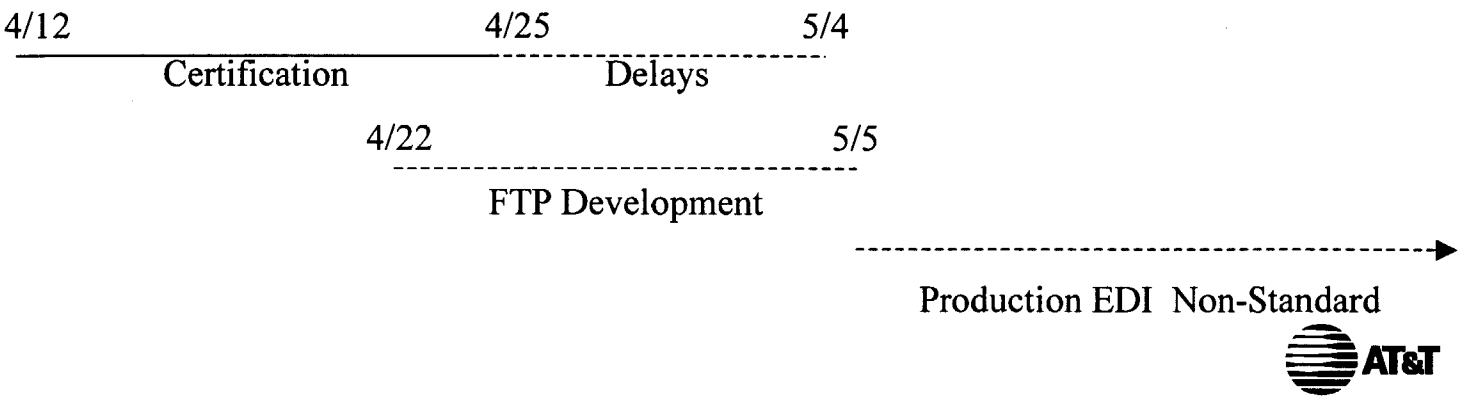
- Lack of Complex Completion
  - "Billed But Unearned" Conditions Go Undetected
- 12% Drop Out In Daily Usage Feeds
  - CLEC Unable to Bill Local Customers and IXCs
  - Some Offices Have Much Higher Than Average Drop Out (20%-30%)
- 42% of UNE Bills Have Errors
- Recommended Certification Activity: Rerun 3rd Party OS Test or Use MCIWC Experience or AT&T Friendly Test
  - DUF 99% Complete and Correct Overall
  - All Offices and Traffic Categories (Local, Interlata, Collect, 800, Etc.) At Least 95% Complete and Correct

Bell Atlantic Has Delayed The Start of the Consumer UNE-P Friendly Test...

- We Planned to Begin Testing on 5/3



- BA Has Caused Delays and Our Testing Has Not Yet Begun



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We Have Uncovered Serious Bell Atlantic Issues That Must Be Resolved...

- The Issues Delaying The Friendly Test Will Also Delay Or Impede Deployment of Our Platform
- Continued Regulatory Intervention Is Critical To Barrier Removal
- A Market Test Is An Absolute Necessity To Prove That The AT&T-Bell Atlantic Platform Is Commercially Viable

Overlapping Delays Caused By Bell Atlantic Turned Certification from a 13-Day Process into a 22-Day Process...

- Certification Delays

Issue	Length of Delay And Related KPMG Exception
No Feature Detail Rules Provided Prior to Start of Certification.	3 Days Lack of Documentation
Migrate w/ Change Rules Unclear. Reject Explanation Not Received for 2 Days.	3 Days Lack of Documentation Lack of Certification Resources
Erroneous Rejection of Certification Orders.	2 Days Unstable Quality Assurance Environment
Quality Assurance Environment Unavailable 5/1-5/2 Due to Emergency Release.	2 Days Insufficient Quality Assurance Resources

AT&T

On 4/22, Bell Atlantic Reneged On A 3/10 Agreement Allowing AT&T To Interconnect a Second Gateway Via VAN-to-VAN Connection...

- Bell Atlantic Discovered That Their Legacy Systems Could Not Accommodate This Form Of Interconnection For A Second Gateway

- Since Bell Atlantic Has So Far Refused To Develop Connect:Direct, This Required Emergency Development Of FTP By Cap Gemini

- Development Was Completed And Tested 5/5

- This Has Delayed Other Cap Gemini Work To Support The Consumer Test

- The Development of the Business UNE-P Map, Slated To Begin In April, Has Still Not Started

- We Are Looking At (A More Costly?) Back Up Plan To Use Hewlett-Packard To Make the 6/7 Start Date

AT&T

Bell Atlantic's Production Environment Differs From Certification And Contains Non-Standard EDI Implementation. This Has Halted Testing.

- The Bell Atlantic Certification Environment Uses Standard EDI 3072
  - Eight Digit Date Fields
  - Y2K Compliant
- The Bell Atlantic Production Environment Places An EDI 3072 Header On Transactions But Contains a Six Digit Date Field In Acknowledgements!
  - Non-Standard Implementation
  - Prevents Our Gateway From Systematically Extracting Time-Stamps to Support Metrics Calculation
  - Spurious Control M's In Acknowledgments Also Prevent Systematic Processing
- Alternatives
  - BA Places EDI 3050 Header On 997's ⇒ Did Not Work
  - BA Standardizes Its Production ⇒ Affects Trading Partners
  - BA Standardizes And Dedicates Gateway to AT&T Consumer UNE-P ⇒ AT&T Changes IP Addresses
  - Cap Gemini Matches Non-Standard Implementation ⇒ AT&T Dedicates Gateway to Consumer UNE-P

BA-NY HOT CUT LOOP
PERFORMANCE DATA
March 23 - April 19

- For the **54** AT&T hot cut loop orders that BA-NY actually attempted to cutover to AT&T, **9** of the orders -- approximately **17%** -- resulted in hot cut loops that didn't work as initially provisioned by BA-NY due to BA-NY's acknowledged provisioning errors.

- Customers experienced interruptions of telephone service ranging from about **one-half hour** to more than **48 hours** as a result of BA-NY's provisioning errors.

- BA-NY is not following the revised procedures that it explicitly committed to AT&T would be followed as of March 23. BA-NY has provided initial notification that the customer is served by IDLC facilities on a hot cut due date. This demonstrates that BA-NY either failed to perform required testing **two days before the due date** as it has committed to do under the revised process or to report the IDLC problem if it did perform the testing.

- **One quarter** (**27** out of 113) of the LSRCs BA-NY provided to AT&T were incorrect. The errors included: incorrect telephone number; no telephone number; incorrect due date; incorrect cable and pair information; missing TXNU number; and incorrect TXNU number.

BA-NY HOT CUT LOOP
PERFORMANCE
APRIL 20 THROUGH MAY 3

- For the **74** AT&T hot cut loop orders that BA-NY actually attempted to cutover to AT&T, **20** of the orders -- approximately **27%** -- resulted in hot cut loops that didn't work as initially provisioned by BA-NY due to BA-NY's acknowledged provisioning errors.

- Customers experienced interruptions of telephone service ranging from under **1 hour** to more than **48 hours** as a result of BA-NY's provisioning errors.

- BA-NY is still not following the revised procedures that it explicitly committed to AT&T would be followed as of March 23. For example, BA-NY has provided initial notification that the customer is served by IDLC facilities on a hot cut due date. This demonstrates that BA-NY failed to perform required testing **two days before the due date** as it has committed to do under the revised process.

- **One quarter** (**33** out of 127) of the LSRCs BA-NY provided to AT&T were incorrect. The errors included: incorrect telephone number; no telephone number; incorrect due date; incorrect cable and pair information; missing TXNU number; and incorrect TXNU number.

two days before, began on April 12, 1999. The full implementation of the process described above addresses concerns identified by KPMG in connection with Exceptions 8 and 9.

LNP Provisioning Issues

168. BA-NY has had considerable success in providing Local Number Portability since the completion of LNP deployment within the BA-NY's operating area. As of February 1999, there are 36,206 INP and 61,815 LNP numbers in service. Over the past five months (October 1998 to February 1999), BA-NY has completed 5,622 orders involving 41,429 ported numbers for CLECs. Of these orders, more than 97% were completed on time. While some carriers, such as MCI WorldCom in its March 4, 1999 filing, claim that LNP performance is lacking, the numbers at hand disprove that assertion.

169. MCI WorldCom says that it has experienced problems with number portability and that it has provided BA-NY with detailed accounts of MCI WorldCom's customer service outages and other problems related to LNP. (MCI WorldCom 21.) MCI WorldCom also says that meetings with BA-NY have not eliminated such outages. In fact, BA-NY has worked cooperatively and diligently with MCI WorldCom to address its needs and concerns in this area. For instance, BA-NY took the extra step of providing MCI WorldCom with the shadow numbers associated with INP, *i.e.*, the call forwarding number. There simply is no basis to MCI WorldCom's claim that BA-NY ignores practical problems with implementation of LNP in New York. Even MCI WorldCom acknowledges that BA-NY has routinely met with it on a weekly basis to cooperatively work through issues that they bring to the table. In an effort to accommodate MCI WorldCom's needs, BA-NY has over the past four months:

numerous orders as delayed because AT&T still carried the order as open long after BA-NY had completed it. This issue of untimely testing has also been addressed on an industry-wide basis in the C2C proceeding. Unlike AT&T's procedures, the C2C group agreed that CLECs must be prepared to test the delivered circuit upon contact by BA-NY. The CLECs agreed that, within an hour, they would accept the circuit or indicate that they had observed a problem. If the circuit was accepted or the CLEC had not identified any problem, BA-NY would complete the circuit and mark the cutover as made. If a problem was identified, BA-NY would immediately commence corrective measures. If this corrective process determined that BA-NY caused the problem, the circuit would be marked as missed.

Revised Hot Cut/LNP Cutover Procedures

165. Notwithstanding the complete absence of AT&T data to support its claims, it became clear to BA-NY in the reconciliation effort that AT&T and BA-NY had different ideas as to the procedures each should employ to assure a successful cutover. With different CLECs using different internal processes, and ongoing CLEC mergers and reorganizations resulting in further internal process changes, it became clear that a single detailed industry standard process that BA-NY and the CLECs all would follow would be of significant benefit to the hot cut process. BA-NY has accepted the challenge to close out these differences, working with all CLECs and the Commission Staff to establish a set of commonly accepted intercarrier procedures for completing "hot cut" loop cutovers with number portability.

166. In a series of meetings guided by the Staff, the industry group has agreed to a common set of CLEC/BA-NY procedures, as follows :

(1) CLECs will submit, and BA-NY will verify, a loop hot cut order with complete information (including cable and pair location on

the POT Bay, the telephone number, the porting date, and cutover time) on the LSR;

(2) BA-NY will create the internal Service Orders and provide the LSRC to the CLEC with the due date, including frame due time. This includes the unconditional trigger translation order (date due two days prior to cut) to allow a smooth transition of telephone service;

(3) BA-NY service order automatically generates Service Order Activation ("SOA") subscription for LNP (except DID orders);

(4) CLEC will enter its LNP subscription to NPAC within 18 business hours of receipt of the LSRC;

(a) If CLEC does not enter NPAC subscription within 18 business hours, NPAC sends a cancellation message to CLEC and BA-NY's Regional CLEC Coordination Center ("RCCC"). CLEC is notified by RCCC. RCCC/LNP group issues a "create message" through SOA which gives the CLEC another 18 hours to enter its subscription;

(5) Prior to date due minus 2 days, BA-NY's RCCC verifies the service request with the CLEC (due date, frame due time, and number of lines), and exchanges contact names and numbers;

(6) BA-NY checks the availability of and assigns facilities (in the event a customer is served with IDLC facilities, BA-NY has developed a new process to effect timely hot cuts. This process is described more fully in this Affidavit);

(7) By the due date minus 3 days, the CLEC will have established dial tone on the circuits, verified the ANI and checked the facilities on its side of the network. In addition, as described in the collocation section, BA-NY has begun to institute a joint quality certification process that will reduce the frequency of CLEC no-dial-tone occurrences. This process allows the CLEC and BA-NY to pre-test the equipment configurations from the CLEC's switch through BA-NY's main distributing frame;

(8) At due date minus 2 days, BA-NY will confirm the CLEC dial tone at the main distributing frame, and physically verify assignments and the telephone number on the BA-NY facilities;

(a) If the CLEC has failed to establish dial tone, BA-NY will stop the order and contact the CLEC as to this condition –

the CLEC will then have until 5 P.M. (or 4 hours) to correct dial tone and restart the order for the original due date (otherwise a new due date will be established);

(9) On the due date, BA-NY will contact the CLEC one hour before time to indicate that the cutover is ready to proceed and obtain final authorization;

(10) BA-NY's RCCC calls BA-NY's frame technician to proceed. The BA-NY frame technician verifies the line for idle condition and reverifies CLEC dial tone and ANI – and if all are okay, performs the final cutover wiring;

(11) BA-NY's RCCC contacts BA-NY's Recent Change Memory Administration Center ("RCMAC") to complete disconnect translations of BA-NY's original service;

(12) After cutover work is complete, BA-NY's RCCC will contact the CLEC to activate LNP and begin acceptance and testing; and

(13) Within one hour, the CLEC will determine that the cutover is successful and notify BA-NY to complete the order;

(a) If the CLEC determines that the cutover was not successful, the CLEC will so notify the BA-NY RCCC within one hour, and BA-NY will initiate corrective action;

(b) If the CLEC does not notify BA-NY within one hour of a problem in the cutover, BA-NY will complete the order – thereafter any CLEC identified problem will be identified to BA-NY via the creation of a trouble ticket through BA-NY's RCMC.

167. This process contains a number of the proposals made by AT&T, but tempers these with a recognition of the CLEC's own responsibilities in this intercarrier service transfer. The process outlined above is set forth in the flowchart which was provided to the Commission on March 23, 1999, and attached as Exhibit Part V. This process was put into effect on March 22, 1999, when BA-NY eliminated the distribution of "bedsheets" to the frame and RCMAC personnel. Movement of the initial dial-tone check from one day before the due date to

two days before, began on April 12, 1999. The full implementation of the process described above addresses concerns identified by KPMG in connection with Exceptions 8 and 9.

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